

**IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY,
PENNSYLVANIA**

CIVIL DIVISION

JILL ANTONELLA-TAYLOR, LINDA ASBURY,)
KAREN MCCOY, and CHRISTINE MOTTO,)

Plaintiffs,)

v.)

Doc. No. GD

THE CATHOLIC CEMETERIES ASSOCIATION)
OF THE DIOCESE OF PITTSBURGH, THE)
CATHOLIC PARISH CEMETERIES)
ASSOCIATION OF THE DIOCESE OF)
PITTSBURGH, and THE CATHOLIC DIOCESE)
OF PITTSBURGH,)

Defendants.)

Type of Pleading:

PRAECIPE FOR WRIT OF
SUMMONS

Filed on behalf of:

JILL ANTONELLA-TAYLOR,
LINDA ASBURY, KAREN
MCCOY and CHRISTINE MOTTO
Plaintiffs

Counsel of Record:

D. SCOTT LAUTNER, ESQUIRE
Pa. I.D. No. 80134

68 Old Clairton Road
Pittsburgh, PA 15236

(412) 650-8820



**IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY,
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ASSOCIATION OF THE DIOCESE OF)
PITTSBURGH, and THE CATHOLIC DIOCESE)
OF PITTSBURGH,)

Defendants.)

PRAECIPE FOR WRIT OF SUMMONS

TO THE PROTHONOTARY:

Kindly issue a Writ of Summons in the above-captioned matter.

Respectfully submitted:

/s/ D. Scott Lautner, Esquire
D. Scott Lautner, Esquire
Attorney for Plaintiff

**IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY,
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CIVIL DIVISION

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ASSOCIATION OF THE DIOCESE OF)
PITTSBURGH, and THE CATHOLIC DIOCESE)
OF PITTSBURGH,)

Defendants.)

CERTIFICATE OF COMPLIANCE

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial Systems of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

Submitted by: D. Scott Lautner, Esquire

Signature: /s/ D. Scott Lautner, Esquire

Name: D. Scott Lautner, Esquire

Attorney No.: 80134

CERTIFICATE OF SERVICE

I, D. Scott Lautner, Esquire, certify that a true and correct copy of the within Praecipe for Writ of Summons via U.S. First Class Mail on the 22nd day of January, 2021, to the following:

The Catholic Cemeteries Association of the Diocese of Pittsburgh
718 Hazelwood Avenue
Pittsburgh, Pennsylvania 15217

The Catholic Parish Cemeteries Association of the Diocese of Pittsburgh
1000 Logue Street
Pittsburgh, Pennsylvania 15220

The Catholic Diocese of Pittsburgh
111 Boulevard of the Allies
Pittsburgh, Pennsylvania 15222

/s/ D. Scott Lautner, Esquire
D. Scott Lautner, Esquire
Attorney for Plaintiff

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

JILL ANTONELLA-TAYLOR, LINDA
ASBURY, KAREN MCCOY, and
CHRISTINE MOTTO,

CIVIL DIVISION

No. GD 21-000690

Plaintiffs,

v.

THE CATHOLIC CEMETERIES
ASSOCIATION OF THE DIOCESE OF
PITTSBURGH, THE CATHOLIC PARISH
CEMETERIES ASSOCIATION OF THE
DIOCESE OF PITTSBURGH, and THE
CATHOLIC DIOCESE OF PITTSBURGH,

PRAECIPE FOR APPEARANCE

Filed on behalf of:
Defendants, The Catholic Cemeteries
Association of the Diocese of Pittsburgh, The
Catholic Parish Cemeteries Association of the
Diocese of Pittsburgh, and The Catholic
Diocese of Pittsburgh

Defendants.

Counsel of Record for this party:
JONI M. MANGINO, ESQUIRE
E-mail: mangino@zklaw.com
Pa. I.D. #43586

GREGORY C. SCHEURING, ESQUIRE
E-Mail: scheuring@zklaw.com
Pa. I.D. #90043

ZIMMER KUNZ, PLLC
Firm #920
310 Grant Street, Suite 3000
Pittsburgh, PA 15219

(412) 281-8000

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY,
PENNSYLVANIA

JILL ANTONELLA-TAYLOR, LINDA
ASBURY, KAREN MCCOY, and
CHRISTINE MOTTO,

CIVIL DIVISION

No.: GD 21-000690

Plaintiffs,

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THE CATHOLIC CEMETERIES
ASSOCIATION OF THE DIOCESE OF
PITTSBURGH, THE CATHOLIC PARISH
CEMETERIES ASSOCIATION OF THE
DIOCESE OF PITTSBURGH, and THE
CATHOLIC DIOCESE OF PITTSBURGH,

Defendants.

PRAECIPE FOR APPEARANCE

TO: DEPARTMENT OF COURT RECORDS, ALLEGHENY COUNTY

Kindly enter this appearance of Joni M. Mangino, Esquire, Gregory C. Scheuring, Jr., Esquire and Zimmer Kunz, PLLC on behalf of all Defendants in the above-captioned matter.

Respectfully submitted,

ZIMMER KUNZ, PLLC

By: /s/ Joni M. Mangino

JONI M. MANGINO, ESQUIRE

Pa I.D. #43586

mangino@zklaw.com

GREGORY C. SCHEURING, ESQUIRE

Pa I.D. #90043

scheuring@zklaw.com

Attorneys for the Defendants

310 Grant Street, Suite 3000

Pittsburgh, PA 15219

(412) 281-8000

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I certify that this filing complies With the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

Submitted by: Joni M. Mangino, Esquire; Gregory C. Scheuring, Jr., Esquire

Signature: /s/ Joni M. Mangino; /s/ Gregory C. Scheuring

Name: Joni M. Mangino, Esquire; Gregory C. Scheuring, Jr., Esquire

Attorney No, (if applicable): 43586; 90043

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the within PRAECIPE FOR APPEARANCE has been served upon Plaintiffs' counsel by E-mail and mailing same by E-mail this 27th day of May, 2021.

D. Scott Lautner, Esquire
68 Old Clairton Road
Pittsburgh, PA 15236
(Email: Scott@LautnerLaw.com)
(Attorney for Plaintiffs)

ZIMMER KUNZ, PLLC

BY /s/ Joni M. Mangino
JONI M. MANGINO, ESQUIRE
GREGORY C. SCHEURING, JR., ESQUIRE

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY,
PENNSYLVANIA

JILL ANTONELLA-TAYLOR, LINDA
ASBURY, KAREN MCCOY, and
CHRISTINE MOTTO,

CIVIL DIVISION

No.: GD 21-000690

Plaintiffs,

v.

THE CATHOLIC CEMETERIES
ASSOCIATION OF THE DIOCESE OF
PITTSBURGH, THE CATHOLIC PARISH
CEMETERIES ASSOCIATION OF THE
DIOCESE OF PITTSBURGH, and THE
CATHOLIC DIOCESE OF PITTSBURGH,

Defendants.

**PRAECIPE FOR ISSUANCE OF RULE
TO FILE A COMPLAINT**

Filed on behalf of:
Defendants, The Catholic Cemeteries
Association of the Diocese of Pittsburgh, The
Catholic Parish Cemeteries Association of the
Diocese of Pittsburgh, and The Catholic
Diocese of Pittsburgh

Counsel of Record for this party:
JONI M. MANGINO, ESQUIRE
E-mail: mangino@zklaw.com
Pa. I.D. #43586

GREGORY C. SCHEURING, ESQUIRE
E-Mail: scheuring@zklaw.com
Pa. I.D. #90043

ZIMMER KUNZ, PLLC
Firm #920
The Grant Building
310 Grant Street, Suite 3000
Pittsburgh, PA 15219
(412) 281-8000

JURY TRIAL DEMANDED

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY,
PENNSYLVANIA

JILL ANTONELLA-TAYLOR, LINDA
ASBURY, KAREN MCCOY, and
CHRISTINE MOTTO,

CIVIL DIVISION

No.: GD 21-000690

Plaintiffs,

v.

THE CATHOLIC CEMETERIES
ASSOCIATION OF THE DIOCESE OF
PITTSBURGH, THE CATHOLIC PARISH
CEMETERIES ASSOCIATION OF THE
DIOCESE OF PITTSBURGH, and THE
CATHOLIC DIOCESE OF PITTSBURGH,

Defendants.

PRAECIPE FOR ISSUANCE OF RULE TO FILE A COMPLAINT

TO: THE DEPARTMENT OF COURT RECORDS OF ALLEGHENY COUNTY:

Please issue a Rule compelling Plaintiffs to file a Complaint, in the above captioned
matter. Thank you.

Respectfully submitted,

ZIMMER KUNZ, PLLC

BY /s/Joni M. Mangino

JONI M. MANGINO, ESQUIRE

Pa I.D. #43586

mangino@zklaw.com

GREGORY C. SCHEURING, ESQUIRE

Pa I.D. #90043

scheuring@zklaw.com

Attorneys for the Defendants

310 Grant Street, Suite 3000

Pittsburgh, PA 15219

(412) 281-8000

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY,
PENNSYLVANIA

JILL ANTONELLA-TAYLOR, LINDA
ASBURY, KAREN MCCOY, and
CHRISTINE MOTTO,

CIVIL DIVISION

No.: GD 21-000690

Plaintiffs,

v.

THE CATHOLIC CEMETERIES
ASSOCIATION OF THE DIOCESE OF
PITTSBURGH, THE CATHOLIC PARISH
CEMETERIES ASSOCIATION OF THE
DIOCESE OF PITTSBURGH, and THE
CATHOLIC DIOCESE OF PITTSBURGH,

Defendants.

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the within PRAECIPE FOR
ISSUANCE OF RULE TO FILE A COMPLAINT was forwarded to counsel below named by E-
mail and regular mail on the 27th day of May, 2021.

D. Scott Lautner, Esquire
68 Old Clairton Road
Pittsburgh, PA 15236
(Email: Scott@LautnerLaw.com)
(Attorney for Plaintiffs)

ZIMMER KUNZ, PLLC

BY /s/ Joni M. Mangino
JONI M. MANGINO, ESQUIRE
GREGORY C. SCHEURING, JR., ESQUIRE

CERTIFICATE OF COMPLIANCE

I certify that this filing complies With the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

Submitted by: Joni M. Mangino, Esquire; Gregory C. Scheuring, Jr., Esquire

Signature: /s/Joni M. Mangino; /s/Gregory C. Scheuring

Name: Joni M. Mangino, Esquire; Gregory C. Scheuring, Jr., Esquire

Attorney No, (if applicable): 43586; 90043

By: /s/ D. Scott Lautner, Esquire
D. Scott Lautner, Esquire
Attorney for Plaintiff

**IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY,
PENNSYLVANIA**

CIVIL DIVISION

JILL ANTONELLA-TAYLOR, LINDA)
ASBURY, KAREN MCCOY, and)
CHRISTINE MOTTO,)

Plaintiff,)

v.)

Doc. No. GD 21-000690

THE CATHOLIC CEMETERIES ASSOCIATION)
OF THE DIOCESE OF PITTSBURGH,)

Defendant.)

NOTICE TO DEFEND

You have been sued in Court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Complaint and Notice are served, by entering a written appearance personally or by attorney and filing in writing with the Court your defenses or objections to the claims set forth against you. Your are warned that if you fail to do so, the case may proceed without you and a judgment may be entered against you by the Court without further notice for any money claimed in the Complaint or for any other claim or relief requested by the Plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

**LAWYER REFERRAL SERVICE
ALLEGHENY COUNTY BAR ASSOCIATION
KOPPERS BUILDING, SUITE 400
436 SEVENTH AVENUE
PITTSBURGH, PA 15219
(412) 261-0518**

**IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY,
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CIVIL DIVISION

JILL ANTONELLA-TAYLOR, LINDA
ASBURY, KAREN MCCOY, and
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v.

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Defendant.)

Doc. No. GD 21-000690

COMPLAINT IN CIVIL ACTION

AND NOW COMES, Plaintiffs, by and through their counsel, D. Scott Lautner,
Esquire, and avers as follows:

PARTIES

1. Plaintiff, Jill Antonella-Taylor, is an adult individual with a primary address located at 304 Mohawk Drive, McKeesport, Pennsylvania 15135.
2. Plaintiff, Linda Asbury, is an adult individual with a primary address located at 3051 Brownsville Road Ext. South Park, PA 15129.
3. Plaintiff, Karen McCoy, is an adult individual with a primary address located at 258 Picture Drive Pittsburgh, PA 15236.
4. Plaintiff, Christine Motto, is an adult individual with a primary address located at 7338 Schover Avenue Pittsburgh, PA 15218.

5. Defendant, Catholic Cemeteries Association of the Diocese of Pittsburgh, is a Pennsylvania corporation with a primary address located at 718 Hazelwood Avenue, Pittsburgh, Pennsylvania 15217.

VENUE

6. Venue is proper in Allegheny County as both parties are located in Allegheny County and all incidents related to this action took place in Allegheny County.

FACTS

7. The Plaintiffs are all former employees of Defendant, each of whom was passed over for advancement, as a result of their age and gender, while their male counterparts were paid higher salaries.

8. Plaintiff, Jill Antonella-Taylor, was hired in 2011 and worked at the Sacred Heart Cemetery.

9. Plaintiff, Linda Asbury, was hired 2000 and most recently worked at the Calvary Cemetery.

10. Plaintiff, Karen McCoy, was hired 2007 and most recently worked at the Calvary Cemetery.

11. Plaintiff, Christine Motto, was hired in approximately 1997 and most recently worked at the Calvary Cemetery.

12. Christine Mot to avers that during the twenty-three (23) years she was employed by The Catholic Cemeteries Association of the Diocese of Pittsburgh (CCA),

13. Plaintiffs aver they were regularly and routinely harassed by Joseph Hubert, John Smouse, Dwayne Vula, Michael Sinott, and Matthew Cahalan.

13. Plaintiffs aver they were denied opportunities for promotions and advancements, which is an inequitable application of workplace rules and regulations. She was subject to verbal harassment, demotion, and reduction in compensation.

14. When complaints were issued to the CCA, they were ignored.

15. Said harassment took a toll and had a direct impact on Plaintiffs' health and financially.

COUNT I – AGE DISCRIMINATION

16. Paragraphs 1 through 15 are hereby incorporated by reference as if set forth at length, herein Count I – Age Discrimination.

17. Plaintiffs were discriminated against on the basis of age in violation of the Age Discrimination in Employment Act of 1967, as amended.

18. Plaintiffs are in a protected class by virtue of their age.

19. Plaintiffs suffered an adverse employment action by failing to be paid equally to their male counterparts and their failure to be promoted.

WHEREFORE, Plaintiffs prays this Honorable Court to grant the following:

1. Monetary damages in excess of \$35,000.00;
2. Reasonable costs, interest, and expenses, including but not limited to reasonable attorney's fees;
3. Punitive and/or exemplary damages; and
4. Any other remedy this Honorable Court may deem appropriate.

COUNT II – GENDER DISCRIMINATION

20. Paragraphs 1 through 19 are hereby incorporated by reference as if set forth at length, herein Count II – Gender Discrimination.

21. Plaintiffs were discriminated against on the basis of gender in violation of Title VII of the Civil Rights Act of 1964, as amended, codified at 42 U.S.C. §2000e(k).

22. Plaintiffs, as females, are protected from discrimination based on their gender.

23. Plaintiffs suffered an adverse action in being bpaid lesser salaries and being passed over for promotion by lesser qualified male counterparts

WHEREFORE, Plaintiffs pray this Honorable Court to grant the following:

1. Monetary damages in excess of \$35,000.00;
2. Reasonable costs, interest, and expenses, including but not limited to reasonable attorney's fees;
3. Punitive and/or exemplary damages; and
4. Any other remedy this Honorable Court may deem appropriate.

Respectfully submitted,

/s/ D. Scott Lautner, Esquire
D. Scott Lautner, Esquire
Attorney for Plaintiffs

VERIFICATION

I verify that the statements under this *Complaint in Civil Action* are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. §4904, relating to unsworn falsification to authorities.

/s/ Jill Antonella-Taylor

/s/ Linda Asbury

/s/ Karen McCoy

/s/Christine Motto

Date: July 1, 2021

**IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY,
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JILL ANTONELLA-TAYLOR, LINDA
ASBURY, KAREN MCCOY, and
CHRISTINE MOTTO,

Plaintiff,

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OF THE DIOCESE OF PITTSBURGH,

Defendant.

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Submitted by: D. Scott Lautner, Esquire

Signature: /s/ D. Scott Lautner, Esquire

Name: D. Scott Lautner, Esquire

Attorney No.: 80134

CERTIFICATE OF SERVICE

I, D. Scott Lautner, Esquire, certify that a true and correct copy of the within Complaint in Civil Action was served via electronic mail on the 1st day of July, 2021 to the following:

JONI M. MANGINO, ESQUIRE

magino@kzlaw.com

GREGORY C. SCHEURING, ESQUIRE

scheuring@kzlaw.com

/s/ D. Scott Lautner, Esquire

D. Scott Lautner, Esquire

Attorney for Plaintiff